

**ORIGINAL UNITED STATES DISTRICT COURT**

NORTHERN DISTRICT OF GEORGIA

JUL 24 2012

UNITED STATES OF AMERICA

v.

JAMES W. HATTEM, Clerk  
By: *Aspin & Smith*  
Deputy Clerk**CRIMINAL COMPLAINT**DETRICK MATTOX, and  
JASMINE HUDSON

NO. 1:12-MJ-959

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief, that:

**COUNT ONE**

On or about October 27, 2011, in the Northern District of Georgia, the defendants Detrick Mattox and Jasmine Hudson, aided and abetted by each other, did knowingly devise and intend to devise a scheme and artifice to defraud (that is: to sell a fraudulent work-from-home program) and to obtain money and property from an undercover law enforcement officer by means of materially false and fraudulent pretenses and representations, and by omission of material facts, well knowing and having reason to know that said pretenses and representations were and would be false and fraudulent when made and caused to be made and that said omissions were and would be material; and in executing said scheme did attempt to knowingly cause a money order to be sent and delivered by the United States Postal Service according to the directions thereon; in violation of Title 18, United States Code, Sections 2, 1341, and 1349.

**COUNT TWO**

On or about October 28, 2011, in the Northern District of Georgia, the defendants Detrick Mattox and Jasmine Hudson, aided and abetted by each other, did knowingly devise and intend to devise a scheme and artifice to defraud (that is: to sell a fraudulent work-from-home program) and to obtain money and property from an undercover law enforcement officer by means of materially false and fraudulent pretenses and representations, and by omission of material facts, well knowing and having reason to know that said pretenses and representations were and would be false and fraudulent when made and caused to be made and that said omissions were and would be material; and in executing said scheme did attempt to knowingly cause a money order to be sent and delivered by the United States Postal Service according to the directions thereon; in violation of Title 18, United States Code, Sections 2, 1341, and 1349.

I further state that I am a Inspector of the U.S. Postal Inspection Service and that this complaint is based on the following facts:

**SEE ATTACHED AFFIDAVIT**

Continued on the attached sheet and made a part hereof.

(X) Yes ( ) No

Signature of Complainant

Daryl Greenberg

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendants have committed it. Sworn to before me, and subscribed in my presence

July 24<sup>th</sup>, 2012  
Date

at

Atlanta, GA  
City and StateE. Clayton Scofield III  
United States Magistrate Judge  
Name and Title of Judicial Officer*E. Clayton Scofield III*  
Signature of Judicial Officer

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, DARYL S. GREENBERG, being duly sworn, depose and state as follows:

**A. Agent Background & Experience**

1. I am an investigator and law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7). I am an officer of the United States, who is empowered to conduct investigations of, and make arrests for, the offenses enumerated in Title 18, United States Code, Section 2516.

2. I am a U.S. Postal Inspector assigned to the Atlanta Division of the U.S. Postal Inspection Service (USPIS) in Atlanta, GA. I have been employed by the USPIS for approximately 9 years. I attended and completed the United States Postal Inspection Service Academy in Potomac, MD. Prior to federal service, I was a Police Officer in the State of South Carolina for approximately 8 years. I attended and completed the South Carolina Criminal Justice Academy in Columbia, SC. I graduated with a Bachelors of Science degree from The Citadel, The Military College of South Carolina. My job duties include the investigation of criminal violations involving the U.S. Mail, the U.S. Postal Service employees, or the US Postal Service facilities. I am currently assigned to a Mail Fraud Team, which investigates violations of the Mail Fraud statute, 18 U.S.C. § 1341.

3. By this affidavit, I submit that probable cause exists to believe that Detrick MATTOX and Jasmine HUDSON have violated Title 18, United States

Code, Sections 2, 1341, and 1349 (attempted mail fraud).

**B. Sources of Information**

4. The information contained in this Affidavit in Support of Criminal Complaint is based on my own personal knowledge of this case, my training and experience with USPS, as well as my information relayed to me by other law enforcement authorities and other sources of information (including witness interviews, investigative reports, and financial records). The facts in this Affidavit do not reflect the totality of information known to me or other officers, merely the amount needed to establish the probable cause.

**C. Probable Cause**

5. On October 27, 2011, I conducted an undercover operation in connection with a work-from-home investigation. In that regard, I went to the website for Global Assembly Company ([www.globalassemblycompany.com](http://www.globalassemblycompany.com)) with a listed mailing address of P.O. Box 1015, Ellenwood, GA 30294.<sup>1</sup> According to its website, Global Assembly Company sold a work-from-home program. Specifically, Global Assembly Company's website stated that it would pay members \$20 for every booklet that a member mailed/assembled, up to \$5000 per week. To join the program, the prospective member must pay an upfront (and

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<sup>1</sup> On September 10, 2011, Mattox and Hudson opened P.O. Box 1015 in the name of the Premier Mailing Company. In opening the postal box, Mattox and Hudson presented their driver's licenses. On the P.O. Box application, Mattox is listed as the applicant and Hudson as a registered user. On September 26, 2011, a change of address form (PS Form 3575) was completed on-line

allegedly reimbursable) registration fee of from \$100 to \$500. I then printed-out the application to join Global Assembly Company's work-from-home program. I completed the application using an assumed name and included a \$150 money order (serial number: 19109211041). An envelope containing the application and money order was handed delivered to Global Assembly Company at P.O. Box 1015, Ellenwood, GA 30294. Sometime shortly thereafter, the application and money order were removed from P.O. Box 1015. On October 31, 2011, money order 19109211041 was deposited into a personal SunTrust Banking Account (ending in 7891), which was held by Mattox and Hudson. I never received any materials from Global Assembly Company.

6. On October 28, 2011, I conducted a second undercover operation in connection with the instant investigation. In that regard, I went to the website for Premier Mailing Company ([www.premiermailingcompany.com](http://www.premiermailingcompany.com)), with a listed mailing address of P.O. Box 2322, Stockbridge, Georgia 30281.<sup>2</sup> According to its website, Premier Mailing Company sold a work-from-home program. Specifically, Premier Mailing Company's website stated that it would pay members \$10 for every booklet that a member mailed/assembled, up to \$1000 per week. To join the program, the prospective member must pay an upfront (and allegedly

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moving all mail for Jasmine Hudson and the Global Assembly Company to P.O. Box 1015, Ellenwood, GA 30294.

<sup>2</sup> On September 9, 2011, Mattox opened P.O. Box 2322 in the name of Atlantas Mailing Company. In opening the postal box, Mattox presented his driver's license. On the P.O. Box application, Mattox is listed as the applicant and Hudson as a registered user.

reimbursable) registration fee of approximately \$100 or more. I then printed-out the application to join the company's work-from-home program. I completed the application using an assumed named and included a \$107.99 money order (serial number: 19015033601). An envelope containing the application and money order were delivered to Premier Mailing Company at P.O. Box 2322, Stockbridge, Georgia 30281. Sometime shortly thereafter, the application and money order were removed from P.O. Box 2322. On October 31, 2011, money order 19015033601 was then deposited into the personal SunTrust Banking Account (ending in 7891), which was held by Mattox and Hudson. I never received any materials from Global Assembly Company.

**D. Conclusion**

7. Based on the information above, I submit that probable cause exists to believe that Detrick MATTOX and Jasmine HUDSON have attempted to commit mail fraud, in violation of Title 18, United States Code, Sections 2, 1341, and 1349.